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January 23, 2023

**By ECF**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Proskauer Rose LLP v. O'Brien, No. 1:22-cv-10918-AT (S.D.N.Y.)

Dear Judge Torres:

We represent defendant Jonathan O'Brien and write in connection with tomorrow's hearing in this matter. Mr. O'Brien, through counsel, respectfully advises the Court that he no longer has possession of any personal devices that may have Proskauer materials from his seven years of employment. Similarly, Mr. O'Brien's access to any and all personal accounts that may have Proskauer materials from his seven years of employment has been disabled. The details of the removal and disabling are provided in the Declarations of Jonathan Karchmer, Ross M. Keiser, and Jonathan O'Brien, attached as **Exhibits A-C**.

We look forward to appearing before Your Honor tomorrow.

Very truly yours,

YANKWITT LLP

By:

  
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Russell M. Yankwitt  
Michael H. Reed

Attachments

cc: All counsel via ECF